

INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT INDUSTRIAL/HAZARDOUS  
WASTE INSPECTION REPORT



<b>Facility Name:</b> Mid-City Plating		
<b>EPA Identification Number:</b> IND-006-049-456		
<b>Location:</b> 921 East Charles Street		
<b>City:</b> Muncie	<b>County:</b> Delaware	<b>Zip Code:</b> 47305
<b>Inspector:</b> Theresa Pichtel		<b>Inspection Date:</b> 3/14/03
<b>Other IDEM Representatives:</b> None		
<b>Primary contact during inspection:</b> Rod Muzzarelli		

<b>A. Pre-Inspection File Review</b>
<b>Notification Information:</b> 8/8/80 F008/F006/F007/D007/D002/D001
<b>Part B Permitted Units/Issuance Date:</b> None
<b>Part B Permit Reviewed by Inspector:</b> Date N/A
<b>Interim Status Units:</b> None
<b>Post Closure Units:</b> None
<b>Waste Classification/Expiration Date:</b> None
<b>Previous Inspections:</b> 4/16/97
<b>Unresolved violations/comments:</b> None

<b>B. Inspection Findings</b>
<b>I. Facility Description and Processes Inspected</b>
Mid-City Plating is a zinc electroplating facility. Three lines utilize cyanide and generate a cyanide waste (F008). The E-line is the newest line and does not use cyanide. Waste from this line is treated in the wastewater pre-treatment and is thus part of the F006 waste that is generated onsite. D007 waste is also generated and is also treated in the onsite wastewater treatment. (See attached letter from the City of Muncie Bureau of Water Quality.)
<b>II. Regulatory Status/Activity</b>
Large Quantity Generator of hazardous waste. Solid Waste Generator.

III. Hazardous and Universal Waste Streams Noted During Inspection			
EPA #/ Description	Source	Generation Rate	Disposition
F006/Filter cake	Wastewater Treatment	~20 cubic yards/month	Michigan Disposal Waste Treatment Plant, Belleville, MI
F008/Plating bath residue	Plating waste	~20 55-gallon drums/year	
D007/Chromate waste	Plating waste	~10 300-gallon totes/week	

IV. Exempted/Excluded Hazardous Waste Streams and Reason	
None	

V. Transporters	
K-Com Transportation Service IND 984 957 563	

VI. Non-Hazardous Wastes Noted During Inspection			
Description	Source	Generation Rate	Disposition
Rags/Uniforms	Operations	Varies	Cintas
Pallets	Operations	Varies	Recycled
Scrap metal	Operations	Varies	Hartford City Scrap

VII. Container Management Area(s) (including Used Oil) Inspected		
<90(180) Day Accumulation Description of unit	<90(180) Day Accumulation Description of unit	<90(180) Day Accumulation Description of unit
<b>Location:</b> North side of facility; Outside	<b>Location:</b> North side of facility; Inside	<b>Location:</b> Chromate Storage Area
Waste Code      #/Size of Containers	Waste code      #/Size of Containers	Waste Code      #/Size of Containers
F006      1/20 yard rolloff	F008      1/55-gallon drum	D007      10/300 gallon totes

VIII. Satellite Accumulation Area(s) Inspected/ Universal Waste Accumulation Area(s) Inspected		
Location	Waste Code(s)/Process	Comments
None		

IX. Hazardous Waste/Used Oil Tanks Inspected			
Waste Codes/Location	Type/Construction	Size	Quantity On-Site
D007/Chromate storage area	Aboveground/Poly	~750 gallons	~100 gallons

<b>X.</b>	<b>Other Regulated Unit(s) (i.e. Containment Building, Waste Piles, Restricted Waste Sites, etc.) Inspected</b>		
	<b>Waste Codes/Location</b>	<b>Type/Construction</b>	<b>Size</b>
	None.		<b>Quantity On-Site</b>

<b>XI.</b>	<b>Inspection Summary: (Description of facility walkthrough, observed permitted units, record review and post-interview)</b>
<p>There are four electroplating lines used in the facility. The plating process in three of the lines (North Barrel, Udyllite, and Jessup lines) use cyanide and generates a cyanide waste (F008). The fourth line (Hanson or E Line) is the newest line and does not use cyanide. The waste from this line is included in the F006 waste generated from the onsite wastewater treatment system. In all of the lines, chromate is applied to protect the zinc coating. Chromate waste (D007) is generated when the chemistry isn't correct and some of the chromate needs to be removed from the tanks.</p> <p>There are three less than 90-day storage areas onsite. All three were inspected and violations were discovered at the newest storage area, the South Barrel Line. (See Description of Violations.)</p> <p>During the record review, 9 manifests were reviewed and found to be in compliance. Training records were available; however, the last record of training was greater than 2 years ago. (See Description of Violations.)</p>	

<b>XII.</b>	<b>Relevant differences from previous inspections, and additional comments:</b>
<p>The South Barrel Line is no longer in use. The plating tanks have been removed and the area is now used to store totes that store waste chromate (D007) to be sent through the onsite wastewater treatment system. At the time of the last inspection, the chromate was drained from the plating tanks by opening a valve in the tank and it was then hard-piped to the wastewater treatment system. The process caused the facility to exceed permit discharge limits to the City of Muncie Bureau of Water Quality; therefore, the city required Mid-City Plating to batch treat the chromate in their wastewater treatment system thus the facility began using the totes to store the waste until it could be treated in the onsite wastewater treatment system. This new management practice has created a third less-than 90-day storage area for the facility at what used to be the South Barrel Line.</p>	

<b>XIII.</b>	<b>Permitted Facility:</b>
<p>Observed permitted units are consistent with permit requirements:    Yes ____    No ____    N/A <u>X</u>____</p> <p>If no, see Section XVII, Violation Descriptions for details.</p>	

<b>XIV.</b>	<b>Pollution Prevention (P2)</b> P2 opportunities may be available to help save money and reduce environmental risk/liability. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff or CMTI. Please visit the agency's P2 web site at <a href="http://www.in.gov/idem/oppta">www.in.gov/idem/oppta</a> for additional information. The following are additional P2 suggestions that could possibly save money, reduce waste and/or minimize risk.
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The facility is currently looking into alternative plating methods that do not require the use of cyanide. The facility no longer generates used oil as they do not accept oily parts from customers to be plated.

Improved housekeeping practices in the wastewater treatment area were discussed with the facility representative to prevent possible releases and accidents as well as better functioning of the wastewater treatment system.

<b>XV.</b>	<b>Guidance Materials Provided to Facility</b>
None.	

<b>XVI.</b>	<b>Violations.</b> The checklist below is not comprehensive, but includes the most common violations. Checked violations and additional violations are described in detail in Section XVII and include location information, corrective measures, and compliance dates. Appropriate documentation, photographs and maps may also be attached. When appropriate, a representative portion of a facility or documents may be inspected. A description of those portions inspected is provided in Section XI, Inspection Summary.
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1) Hazardous Waste Determination 40 CFR 262.11		15) Maintenance & Operation 262.34 ref 265.31		29) Ignitable/Reactive Wastes 40 CFR 265.176/265.117	
2) Waste Storage 40 CFR 261.5(e), (f) or (g)		16) Communications & Fire (Req. Equip.) 262.34 ref 265.32		30) Inspections... Daily/Weekly (Tanks) 40 CFR 265.195	
3) Disposal/Mgt. CESQG 40 CFR 261.5 (f) or (g)		17) Testing & Maintenance (Equip.) 262.34 ref 265.33		31) Secondary Containment (Tanks) 40 CFR 265.193	
4) Generator EPA ID Number 40 CFR 262.12 & 329 IAC 3.1-1-10		18) Communication & Alarm (Access) 262.34 ref 265.34		32) SQG Tank Standards 40 CFR 265.201	
5) Manifest Requirements 329 IAC 3.1-7, 40 CFR 262.44		19) Aisle Space 262.34 ref 265.35		33) Integrity assessment (Tanks) 40 CFR 265.192	
6) Land Disposal WAP 40 CFR 268.7		20) Police, Fire & Hospital Arrangements 262.34 ref 265.37		34) Subpart BB/CC 40 CFR 265.1050/1080	
7) Land Disposal Notification 40 CFR 268.7		21) Employee Training (SQG) 40 CFR 262.34 (d)		35) Mixing Used Oil (w/ Haz. Waste) 329 IAC 3.1-3-1 & 2	
8) Land Disposal Certification 40 CFR 268.9		22) Response to Emergencies 40 CFR 262.34 (d)		36) Storage of Used Oil (Marking ) 329 IAC 13-4-3	
9) Closed HW container 40 CFR 262.34 ref 265.173		23) Annual/Biennial Report 40 CFR 262.44, IC 13-22-4-3.1	X	37) Release of Used Oil ( response, report, repair) 329 IAC 13-4-3	
10) Container Marking & Labeling 40CFR 262.34 (c) (d) & 268.50	X	24) Contingency plan 262.34 ref 265.50	X	38) Release to the Environment ( Env. Impact) IC 13-30-2	
11) Waste Storage (90/180 days) 40 CFR 262.34 (a), (d), (e) & (f)]		25) Emergency Coordinator 40 CFR 262.34 (d)		39) Solid Waste Mgmt 329-IAC-10	
12) Condition of containers 40 CFR 262.34 ref 265.171		26) Personnel training (LQG) 262.34 ref 265.16	X	40) Permit Conditions 40 CFR 264	
13) Satellite Accumulation 40 CFR 262.34 (c)		27) Labeling/Marking (Universal Waste) 329 IAC 3.1-16		41) Other (See violation descriptions)	
14) Emergency Info Posted 40 CFR 262.34 (d)		28) Storage Time (Universal Waste) 329 IAC 3.1-16			

XVII.	Violation descriptions: Includes observed violations with corresponding regulatory citations and permit conditions (when applicable), corrective measures and compliance dates.
	<p>1. <b>40 CFR 262.34 (a)(2)(3)</b> A generator may accumulate hazardous waste onsite for 90 days or less without a permit providing the date upon which accumulation starts and the word "Hazardous Waste" are clearly marked on the container.</p> <p>The 9, 300-gallon totes used to store waste chromate (D007) were not labeled with the words "Hazardous Waste" and the start of accumulation date.</p> <p><b>Action</b> Immediately begin labeling the 9, 300-gallon totes used to store waste chromate (D007) with the words "Hazardous Waste" and the start of accumulation date.</p> <p>2. <b>40 CFR 262.34/265.54</b> The contingency plan must be reviewed and immediately amended whenever the facility changes in its design, construction, operation or maintenance.</p> <p>The removal of the South Barrel line and the addition of the less than 90-day storage area at that location for spent chromate totes was not indicated on the contingency plan.</p> <p>Immediately update the contingency plan to included any changes in facility design, construction, operation, or Maintenance; specifically, the South Barrel line and spent chromate storage area. Submit documentation of the update to this office within 30 days of receipt of the inspection summary letter.</p> <p>2. <b>40 CFR 262.34/265.16(c)</b> Facility personnel must take part in an annual review of the initial required training.</p> <p>The last training facility personnel obtained was provided in November, 2000.</p> <p><b>Action</b> Immediately provide the annual update of the required training to facility personnel. Submit documentation of the training to this office within 30 days of receipt of the inspection summary letter.</p> <p><b>Additional Area of Concern:</b> In the wastewater treatment storage area, a 750-gallon, aboveground poly tank contained a small amount of waste chromate to be sent through the wastewater treatment system. The material had been in the tank for less than 90-days; however, if the material remains in the tank for greater than 90-days the material is subject to 40 CFR 261.4. If the facility chooses to use the tank, the tank will be subject to 40 CFR Subpart J requirements. Chromate waste is typically managed in 300-gallon totes and the 750-gallon poly tank was used for a one-time situation. The facility representative stated that they do not intend to use the poly tank in the future.</p>

**ATTACHMENTS:**

- ☒ FACILITY MAP WITH LOCATION OF REGULATED WASTE ACTIVITY AND AREAS OF ENVIRONMENTAL CONCERN
- ☐ PHOTO LOG
- ☒ ADDITIONAL DOCUMENTATION

# SITE PLAN

MID-CITY PLATING CO., INC.

416 South Hackley Street

NORTH

THE MAIN OFFICES WERE MOVED AROUND THE CORNER TO THE NEW OFFICE AREA AT 921 E. CHARLES ST.

chromate/acid tanks

SHIPPING DOCK

EXIT

CHEMICAL STORAGE AREA

MID-CITY PLATING CO., INC.  
MUNCIE, INDIANA

E-COAT

ZINC LINE  
MANUFACTURING AREA

OFFICE AREA EXIT

SHIPPING DOCK EXIT

921 E. Charles Street

New  
Crate  
Space  
last week

nick  
pick  
up  
inspection

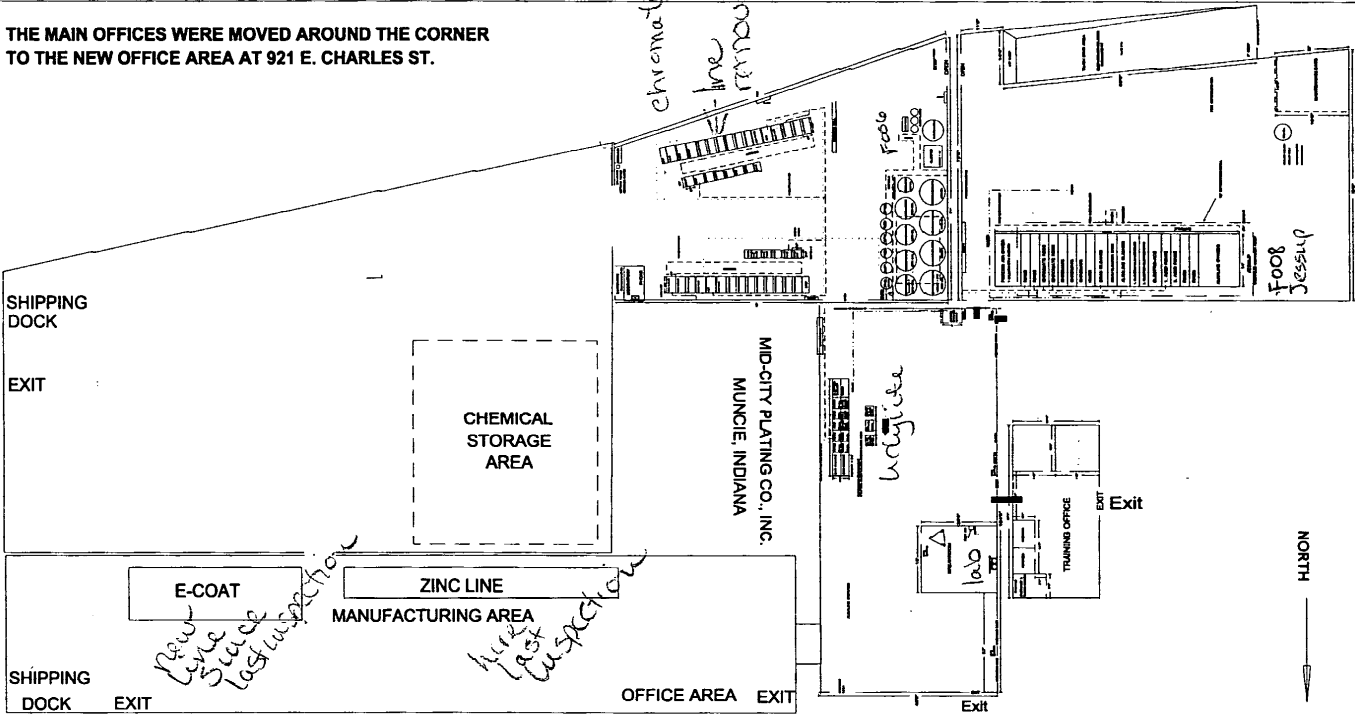
loggia

Exit

TRAINING OFFICE

Exit

FOOD  
JESSIE





**MULTIMEDIA SCREENING CHECKLIST:**  
**Air, Water, Industrial Waste, Underground Storage Tanks**  
**and Toxic Release Inventory**

State Form 50865 (3-02)  
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANA DEPARTMENT OF  
ENVIRONMENTAL MANAGEMENT  
100 N. Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015  
Telephone: (317) 232-8603 or  
Toll Free: 1-800-451-6027 (within Indiana)  
<http://www.IN.gov/idem/>

Please Print Legibly or Type

**SECTION 1: GENERAL INFORMATION**

Facility Name: Mid-City Plating Facility Contact: Rodney Muzzarelli  
SIC Codes for Facility (Primary and Others): 3471  
Description of Major Processes and Estimated Production: Zinc electroplating facility  
Date of Inspection: 3/14/03

**SECTION 2: AIR OBSERVATIONS**

- ☒ Observations for this section of MM screening checklist completed.  
☐ This section of MM screening checklist not completed.  
☐ Refer to regular single-media inspection report or inspection summary letter.

1. Are there any visible emissions (except steam) from any stack or vent? YES ☐ NO ☒  
If YES, identify process, vent or stack, description of emissions (color, duration, constant vs. intermittent), time, and weather conditions (e.g. wind direction).
2. Is there any activity generating dust? YES ☐ NO ☒  
If YES, identify if dust was seen crossing the property lines, identify the source of the emissions, description of emissions (color, duration, constant vs. intermittent), time, and weather conditions (e.g. wind direction).
3. Is there any evidence of open burning? YES ☐ NO ☒  
If YES, describe if burning is/is not occurring at the time of the inspection and describe materials and amounts burned.
4. Are solvent container(s) closed when not in use? YES ☐ NO ☐ N/A  
If NO, describe containers and location (e.g. booth number, department, etc).
5. Are filters securely in place when spray booth(s) are in operation? YES ☐ NO ☐ N/A  
If NO, describe problems with filters (e.g. no filters, sagging filters, torn, etc) and describe location or identification of the spray booth (e.g. booth number or department).

**SECTION 3: WASTEWATER OBSERVATIONS**

- ☐ Observations for this section of MM screening checklist completed.  
☐ This section of MM screening checklist not completed.  
☐ Refer to regular single-media inspection report or inspection summary letter.

1. Are any industrial process wastewaters being generated at this facility? YES ☒ NO ☐  
If YES, specify:

A) Description of wastewaters: CN<sup>-</sup> destruction; pH adjustment;  
metals precipitation; clarification/sludge settling  
and dewatering.



2. Does any process wastewater discharge to a POTW collection system?

If YES, specify:

A) Does the facility have a wastewater permit? YES ☒ NO ☐

B) Permit #

C) Expiration Date:

w/ City of Muncie Bureau of Water Quality  
1/04

3. Was any indication observed that process materials such as cleaners, solvents, paints, lubricants, etc. are escaping through floor drains? YES ☐ NO ☒

If YES, specify:

A) Description of materials:

SECTION 4: STORM WATER OBSERVATIONS

☒ Observations for this section of MM screening checklist completed.

☐ This section of MM screening checklist not completed.

☐ Refer to regular single-media inspection report or inspection summary letter.

1. Do the facility's SIC codes require application for Rule 6 permit coverage pursuant to 327 IAC 15-6 (Storm Water Associated With Industrial Activity)? YES ☐ NO ☒

If YES, specify:

A) Has the facility applied for Rule 6-permit coverage? YES ☐ NO ☐

B) Has the facility prepared and fully implemented a Storm Water Pollution Prevention Plan pursuant to Rule 6? YES ☐ NO ☐

2. Does the facility have any ongoing or proposed land disturbing activities greater than five (5) acres?

YES ☐ NO ☒

If YES, specify:

A) Has the facility applied for Rule 5 permit coverage under 327 IAC 15-5 (Storm Water Associated With Construction Activity)? YES ☐ NO ☐

B) Were any signs of erosion into waters of the state from construction sites observed? YES ☐ NO ☐

3. Describe the general appearance of any observed discharge of wastewater or storm water from discharge pipes.

A) Outfalls observed? YES ☐ NO ☒

B) If YES, note any discharges with foam, oily sheen, solids and floatables, color or odor:

DOCUMENT WITH A PHOTOGRAPH

SECTION 5: DRINKING WATER OBSERVATIONS

☒ Observations for this section of MM screening checklist completed.

☐ This section of MM screening checklist not completed.

☐ Refer to regular single-media inspection report or inspection summary letter.

1. Is the facility's drinking water (drinking water, showers, cafeteria, etc.) supplied by a municipal (public or private) water system? YES ☒ NO ☐

If YES, then do not fill out rest of this section.

A) If NO, does the facility have its own drinking water system for employees (drinking water, showers, cafeteria, etc.) YES ☐ NO ☐

D) If answer to 1.A is YES, is the source of the water supply surface water or ground water?

E) What is the number of employees at the facility?

F) If more than 25 employees, do they have a PWSID #? YES ☐ NO ☐

If YES, specify PWSID #

2. If the facility is a public water supply and has a PWSID #, is the well head on-site? YES ☐ NO ☐

A) If YES, was the well head area observed? YES ☐ NO ☐

B) If answer to 2.A is YES, was the area within a 200-foot radius of the well head free of visible contamination sources? YES ☐ NO ☐

C) If answer to 2.B is NO, please describe:

DOCUMENT WITH A PHOTOGRAPH

#### SECTION 6: INDUSTRIAL WASTE OBSERVATIONS



Observations for this section of MM screening checklist completed.



This section of MM screening checklist not completed.



Refer to regular single-media inspection report or inspection summary letter.

1. Was evidence observed of waste being released to the environment or disposed on-site? (waste piles, excavations, releases, etc.) YES ☐ NO ☐

If YES, please indicate:

A) Nature of evidence:

B) Waste description:

C) Source of the waste:

D) Dimensions of the area:

DOCUMENT WITH A PHOTOGRAPH

#### SECTION 7: UNDERGROUND STORAGE TANK OBSERVATIONS



Observations for this section of MM screening checklist completed.



This section of MM screening checklist not completed.



Refer to regular single-media inspection report or inspection summary letter.

1. Are there any underground storage tanks on-site that have not been registered with IDEM and contains petroleum\* or a hazardous substance? YES ☐ NO ☒

If YES, please indicate:

A) How many?

B) List materials stored in the USTs:

\* Tanks storing fuel for heating are exempt.

**SECTION 8: TOXIC RELEASE INVENTORY OBSERVATIONS**

Observations for this section of MM screening checklist completed

This section of MM screening checklist not completed.

Refer to regular single-media inspection report or inspection summary letter.

1. Are you currently reporting to the Toxic Release Inventory (reports due July 1)? YES ☒ NO ☐  
 Note: If answer to Question 1 is YES, then do not fill out rest of this section.

2. If answer to Question 1 is NO, then do you have 10 or more employees including office staff?  
 YES ☐ NO ☐

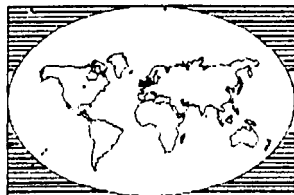
3. If answer to question 2 is YES, then are you a member of any of the following Standard Industrial Classifications?

Check if Member of SIC Group	SIC Category (2 digit)	Standard Industrial Description
<input type="checkbox"/>	10	Metal Mining
<input type="checkbox"/>	12	Coal Mining
<input type="checkbox"/>	20	Food and Kindred Products
<input type="checkbox"/>	21	Tobacco Products
<input type="checkbox"/>	22	Textile Mill Products
<input type="checkbox"/>	23	Apparel and Other Finished Products made from Fabrics and Other Similar Materials
<input type="checkbox"/>	24	Lumber and Wood Products
<input type="checkbox"/>	25	Furniture and Fixtures
<input type="checkbox"/>	26	Paper and Allied Products
<input type="checkbox"/>	27	Printing, Publishing, and Allied Products
<input type="checkbox"/>	28	Chemicals and Allied Products
<input type="checkbox"/>	29	Petroleum Refining and Related Industries (Coal Products)
<input type="checkbox"/>	30	Rubber and Miscellaneous Plastics Products
<input type="checkbox"/>	31	Leather and Leather Products
<input type="checkbox"/>	32	Stone, Clay, Glass and concrete Products
<input type="checkbox"/>	33	Primary Metal Industries
<input checked="" type="checkbox"/>	34	Fabricated Metal Products, except Machinery and Transportation Equipment
<input type="checkbox"/>	35	Industrial and Commercial Machinery and Computer Equipment
<input type="checkbox"/>	36	Electronic and Other Electrical Equipment and Components
<input type="checkbox"/>	37	Transportation Equipment
<input type="checkbox"/>	38	Measuring, Analyzing and Controlling Instruments; Photographic, Medical & Optical Goods; Watches, Clock
<input type="checkbox"/>	39	Miscellaneous Manufacturing Industries
<input type="checkbox"/>	49	Electric, Gas and Sanitary Service
<input type="checkbox"/>	51	Wholesale Trade-Non-durable Goods
<input type="checkbox"/>	73	Business Services
<input type="checkbox"/>	NA	None of the Above

Note: if answer to Question 1 is NO, please forward a copy of completed multimedia inspection form to Marc Hancock of OPPTA.

**ADDITIONAL COMMENTS**

**RECOMMENDATIONS FOR FOLLOW-UP**



"LET'S ALL WORK  
FOR ITS PROTECTION"

## BUREAU OF WATER QUALITY

MUNCIE SANITARY DISTRICT  
5150 W. KILGORE AVENUE  
MUNCIE, INDIANA 47304-4797  
TEL. (765) 747-4896  
FAX. (765) 213-6444

February 28, 2002

### LETTER OF VIOLATION (LOV)

Mr. Rod Muzzarelli, Vice President  
Mid-City Plating Co., Inc.  
921 East Charles Street  
Muncie, Indiana 47305

**Re: Letter of Violation (LOV) for the reoccurring cyanide and zinc violations in your waste water discharge into the Muncie Sanitary sewer.**

Dear Mr. Muzzarelli:

The Bureau of Water Quality, MSD is issuing your company a Letter of Violation. This is because of the infrequent but reoccurring cyanide and zinc exceedances in your wastewater discharge to the Muncie Sanitary sewer. This action is being taken because you have exceeded the cyanide and zinc limits in your Industrial Wastewater Discharge Permit causing there to be minor violations for these discharge limitations. It has been determined that there was no evidence of any negligence or intent upon your part.

To prevent this from happening again you are being instructed to implement the following changes:

- 1) You are to expedite all future sample analyses for your cyanide and zinc samples for a period of no less than two (2) months to ensure compliance;
- 2) You are to instruct all wastewater treatment plant operators that NO wastewaters are to be discharged that have not received proper treatment. All shift operators are to be trained in proper wastewater treatment facility operation and a copy of training documentation submitted to the Bureau;

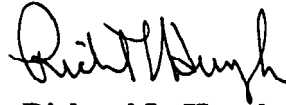


- 3) You are to implement a tank solution dumping schedule to prevent any unauthorized or unexpected discharging of solutions to your wastewater treatment system;
  - 4) All tank drain valves are to have lockouts installed upon them to prevent any unauthorized discharges. Only shift supervisors are to access to the lock keys;
  - 5) All tank solution discharges are to be scheduled no less than one (1) day in advance and only after authorization by management;
  - 6) A complete review of your wastewater treatment facility is to be completed to ensure that all parts are in proper working condition. This is to include a examination of all pumps, a check of all probes, an examination of all feed and discharge lines, and that all wastewater treatment processes are operating as designed;
  - 7) You are instructed to implement a maintenance schedule for the wastewater treatment facility including pumps and probes to ensure its continued proper working order. This is to include a daily log and a daily facility inspection by all shift wastewater treatment operators; and
  - 8) You are instructed to review all the MSDS sheets of the chemicals used in your facility and processes to ensure that no interference or incompatibly properties exist amongst the chemicals.
- New Log

Within fifteen (15) days from receipt of this letter a written report to the Bureau is required. You are instructed to report on what caused these exceedances to occur and all of the corrective actions you instituted to correct these problems. Failure to institute corrective action may result in your company being placed into Significant Non-Compliance. This could include an administrative order and compliance schedule to correct the problem plus the possibility of fines being instituted by the Bureau of Water Quality, Muncie Sanitary District of up to \$1000.00 per day per violation per parameter.

The Bureau and your organization have enjoyed a good working relationship over the past 30 years. It is because of this good past relationship that no other enforcement actions are warranted at this time. If you have any other questions concerning this matter, please call our office. Our hours are 8:00 a.m. to 4:00 p.m., Monday through Friday.

**Very truly yours,**

A handwritten signature in black ink, appearing to read "Rich L. Huyck". The signature is fluid and cursive, with the first name "Rich" and last name "Huyck" clearly distinguishable.

**Richard L. Huyck, Director  
Bureau of Water Quality  
Muncie Sanitary District**

**pc: Board of Sanitary Commissioners**

**Mr. Mike Rost, Muncie Sanitary District Administrator**

**Mr. Bill Blue, Indiana department of Environmental Management, Office of  
Water Management, Pretreatment Section  
Quarterly Pretreatment Report  
files**

March 12, 2002

Mr. Tom Bowling, Jr.  
Pretreatment Coordinator  
Division of Water Quality M.S.D.  
5002 Kilgore Avenue  
Muncie, IN 47304

**Re: Letter of Violation**

Dear Mr. Bowling:

This letter is in response to the Notice of Violation dated February 28, 2002 that we received from your office. We have conducted an investigation into the cause of our effluent samples which exceeding our permit limits. We discovered that a product formulation change was made to our cleaners, which contained a chelating sequestering agent, which interfered in the operations of our wastewater treatment system. We have addressed the suggestions in your letter in our plan to achieve and maintain compliance. They are as follows:

**\* \* Corrective Action Plan \* \* \***

1. We have instructed our outside contract laboratory to expedite all sample analyses for cyanide and zinc.
2. A meeting was held on March 6, 2002. The meeting was with all of our treatment plant operators. At this meeting they were instructed to immediately shut off all incoming water should there be an upset. And also to divert any clarifier water into emergency holding tanks for reprocessing. A new stainless steel pump was purchased to facilitate the transfer to the emergency holding tank. We have contacted Delta Chemicals & Equipment, Inc. to conduct operator training which will include Basics of Wastewater Treatment, Laboratory Procedures, Record Keeping and hands on Trouble Shooting. This training has been scheduled for the week of March 17, 2002. On March 12, 2002 hands on Trouble Shooting and laboratory procedures were conducted for Mr. William Oliver and Marc Muzzarelli. Mr. Jim Collins of Ulrich Chemicals and Martha Martin of Delta conducted the training.
3. A tank-dumping schedule has been implemented as of March 6, 2002. A log form was created to implement these dumps. At our meeting on March 6, 2002 all line supervisors and wastewater treatment operators were informed of the necessity to schedule dumps. Also, we have positioned a series of temporary holding tanks and these are used for emergency dumping.
4. We are in the process of identifying all tank drains that could potentially upset the wastewater system. We will purchase commercially made lockout devices to install on these drains. The tanks that will be locked out are those that could cause an upset to the wastewater treatment system due to a slug discharge. Only shift supervisors and wastewater treatment operators will have access to the keys.
5. All tank solution discharges will be scheduled no less than one day in advance only after authorization by management. For situations that could necessitate an immediate dump, we will utilize the temporary holding tanks.
6. A complete review of our wastewater treatment system was performed to ensure the system is operating as designed. We examined all pumps, probes, feed and discharge lines. Plant maintenance has been instructed to make this a number one priority in the event of the failure of any component.



7. A maintenance schedule for the wastewater treatment facility has been developed. This includes a daily log and a daily facility inspection. We already have in place a probe cleaning and pH meter calibration log.
8. We have reviewed all MSDS sheets for chemicals used in our facility to identify any chemicals that may interfere with our wastewater treatment system. However, during the review and subsequent discussions with our chemical suppliers we learned that not all interfering agents are required to be reported on the MSDS. Therefore, in the future we will do extensive laboratory testing of any new products or process changes to make sure that nothing will interfere with the operation of our wastewater treatment plant.

### **Investigative Report**

During our investigations we found our problem was two-fold. Both of the problems we encountered were chemical in nature. The first one we addressed on the letter to your office dated February 26, 2002. We received out of specification coagulant from our chemical supplier. We isolated it and no longer use it.

Once, this problem was solved we continued to have sporadic excursions above our permit limits. After extensive laboratory testing, we have determined that the problem was found to be a chelator in a new spray cleaner that we were using on our E-Coat line. The chemical manufacturer had been supplying us with chemicals for over 30 years and we trusted their new product to be free of anything that would interfere with our wastewater treatment system. However, analyses on an Atomic Absorption Spectrophotometer showed 21 PPM of chelators present in the discharge to our pretreatment system. Laboratory testing when we removed this cleaner from the waste stream demonstrated a return to normal values. On Saturday, March 9, 2002 we replaced this cleaner with a material that was in the system prior to the change. During the last week of February while we were working on these problems, we did not have a continuous discharge. We are continuing to run laboratory tests on polymers and coagulants that may prevent system upsets in the future.

If you have any questions concerning this response or need additional information, please feel free to call me.

Sincerely,

Rodney Muzzarelli  
General Manager/Owner

**Indiana Department of Environmental Management  
VERIFICATION OF INSPECTION**

This is to verify that on 3/14/03 an inspection of Mid-West Plating Co., Inc. was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Land Quality.

**Type of Inspection (may include more than one):**

Compliance Evaluation

☐ Complaint  
☐ Multi-Media Screening Evaluation  
☐ Other \_\_\_\_\_

**Preliminary Inspection/Screening Findings**

\*These findings are considered preliminary and include specific matters discovered during the inspection that the designated agent of the department believes may be a violation of law or a permit issued by the department.

**Single Media Inspection:**

- ☐ No violations were discovered with respect to the particular items observed during the inspection.  
☐ Potential violations were discovered but corrected during the inspection.  
☒ Potential violations were discovered and require a submittal and/or follow-up inspection.  
☐ Potential violations were discovered and may be referred to our Office of Enforcement.  
☒ Additional information/review is required to evaluate overall compliance.  
☐ Other/Comments (attachment may be included) \_\_\_\_\_

**Multi-Media Screening (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):**

- ☐ Multi-Media Screening not conducted.  
☐ Potential problems or potential violations were discovered but corrected during the inspection.  
☐ Potential problems or potential violations were discovered and will be referred to the Office(s) of \_\_\_\_\_ for further investigation and response.

**Pollution Prevention:**

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that less environmental wastes are generated. Your participation in Indiana's pollution prevention program is entirely voluntary. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? ☐ Yes ☒ No

If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance at 317/233-5627 or 1-800/988-7901 or visit their Web site at <http://www.IN.gov/idem/oppta/p2/>.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

☒ Written inspection summary will be provided within 45 days. ☐ Written report provided at the conclusion of the inspection.

**IDEM Representative:**

Printed Name	Signature	Phone Number	Date	Time
Theresa Richtel	Theresa Richtel	317/308-3050	3/14/03	In:
				Out:

**Owner/Agent Representative:**

Printed Name	Signature	Title	Phone Number	Date
Rod Muzzarelli	[Signature]	OWNER	765-289-2371	3-14-03